

1 **QUINN EMANUEL URQUHART & SULLIVAN, LLP**  
2 Stephen A. Swedlow (admitted *pro hac vice*)  
3 stephenswedlow@quinnemanuel.com  
4 191 N. Wacker Drive, Suite 2700  
5 Chicago, IL 60606  
6 (312) 705-7400

7 *Interim Co-Lead Consumer Class Counsel*

8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **SAN FRANCISCO DIVISION**

11 MAXIMILIAN KLEIN, et al.,

12 Plaintiffs,

13 vs.

14 META PLATFORMS, INC.,

15 Defendant.

Consolidated Case No. 3:20-cv-08570-JD

The Hon. James Donato

**DECLARATION OF STEPHEN A.  
SWEDLOW REGARDING MEET-AND-  
CONFER PURSUANT TO COURT  
ORDER DATED MAY 23, 2022**

1 I, Stephen A. Swedlow, declare and state as follows:

2 1. I am an attorney at law duly admitted to practice before the courts of the State of  
3 Illinois and admitted *pro hac vice* in this case. I am a Partner with the law firm of Quinn Emanuel  
4 Urquhart & Sullivan, LLP, and Interim Co-Lead Counsel for the Consumer Class. I have personal  
5 knowledge of the statements set forth in this Declaration.

6 2. I make this Declaration pursuant to the Court's May 23, 2022 Order (the "Order"),  
7 Dkt. 301, directing lead counsel for the parties to meet-and-confer by June 10, 2022 to resolve their  
8 disputes regarding: (1) Advertiser Plaintiffs' letter brief regarding Facebook presentations made to  
9 the Federal Trade Commission and the United States House of Representatives (Dkt. 281); (2)  
10 Consumer Plaintiffs' letter brief regarding subpoenas to and communications with non-parties (Dkt.  
11 282); (3) Consumer Plaintiffs' letter brief regarding Facebook's document custodians (Dkt. 294);  
12 and (4) Consumer Plaintiffs' letter brief regarding the App Developer Investigation ("ADI")  
13 materials that Facebook has already produced in the Cambridge Analytica MDL (Dkt. 298). I  
14 hereby attest to compliance with the Court's Order.

15 3. On May 27, 2022, I met and conferred with Interim Co-Lead Counsel for the  
16 Consumer Class Shana E. Scarlett, Interim Co-Lead Counsel for the Advertiser Class Yavar Bathaee  
17 and Kristen M. Anderson, Lead Counsel for Facebook Sonal N. Mehta and David Gringer, and other  
18 counsel for the parties, regarding the above, four disputes. The conference lasted more than four  
19 hours.

20 4. At the time of the conference, I was not located within 100 miles of any other lead  
21 counsel and therefore participated via videoconference.

22 5. After more than four hours at the mandated lead counsel conference, Consumer  
23 Plaintiffs and Facebook were unable to resolve their three disputes: (1) subpoenas to and  
24 communications with non-parties (Dkt. 282); (2) Facebook's document custodians (Dkt. 294); and  
25 (3) ADI materials that Facebook has already produced in the Cambridge Analytica MDL (Dkt. 298).

26 6. Consumer Plaintiffs and Facebook have since exchanged further correspondence and  
27 written proposals.

28



**CERTIFICATE OF SERVICE**

I hereby certify that on this 17th day of June 2022, I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF System, causing the document to be electronically served on all attorneys of record.

Dated: June 17, 2022

By: /s/ Stephen A. Swedlow  
Stephen A. Swedlow